

SWIDLER BERLIN SHEREFF FRIEDMAN, LLP

3000 K STREET, NW, SUITE 300
WASHINGTON, DC 20007-5116
TELEPHONE (202) 424-7500
FACSIMILE (202) 424-7645

EDWARD W. KIRSCH
DIRECT DIAL (202) 424-7877
EWKIRSCH@SWIDLAW.COM

NEW YORK OFFICE
919 THIRD AVENUE
NEW YORK, NY 10022

June 22, 1999

VIA HAND DELIVERY

Magalie Roman Salas
Commission Secretary
Federal Communications Commission
Portals II
445 12th Street, N.W.
Suite TW-A325
Washington, D.C. 20554

RECEIVED

JUN 22 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Lightship's IntraLATA Toll Dialing Parity Implementation Plan for Maine,
File No. NSD-L-98-121, CC Docket 96-98

Dear Ms. Salas:

Enclosed for filing with the Federal Communications Commission ("Commission") is an original and four copies of Lightship Telecom, LLC's ("Lightship") "Maine IntraLATA Presubscription Implementation Plan" ("Plan"). Pursuant to the Commission's June 18, 1999 Public Notice, Lightship has enclosed two additional copies of the Plan for Mr. Al McCloud of the Commission's Network Services Division.

Lightship filed its Plan with the Maine Public Utilities Commission ("PUC") on April 21, 1999. The Maine PUC has not yet approved any intraLATA toll dialing parity implementation plans. Lightship, therefore, files its Plan in order to conform to the Commission's Order, released on March 23, 1999, directing local exchange carriers ("LECs") to file their plans with the Commission on June 22, 1999, if "a state commission has not yet acted on a LEC's intraLATA toll dialing parity implementation plan."¹

No. of Copies rec'd 044
List A B C D E

¹ Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, and Petition of Southwestern Bell Telephone Company, Pacific Bell, and Nevada Bell Expedited Declaratory Ruling on Interstate IntraLATA Toll Dialing Parity or, in the Alternative, Various Other Relief, Order, CC Docket 96-98, NSD File No. L-98-121, FCC 99-54 (rel. March 23, 1999).


Magalie Roman Salas

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Thank you for your attention to this matter. Should you have any questions, do not hesitate to contact me at (202) 424-7877.

Sincerely,

A handwritten signature in black ink, reading "Edward W. Kirsch". The signature is written in a cursive style with a large, looped "E" and a distinct "K".

Edward W. Kirsch

Counsel for Lightship Telecom, LLC

Enclosures

cc: Morton J. Posner, Esq. (w/enc.)

LIGHTSHIP TELECOM, LLC

MAINE INTRALATA PRESUBSCRIPTION IMPLEMENTATION PLAN

INTRODUCTION

Lightship Telecom, LLC (“Lightship”) will initiate the process that will give end user customers the opportunity to designate a carrier for their intraLATA toll call traffic in those market areas where Lightship is a local exchange service provider. IntraLATA toll calls will automatically be directed to the designated carrier without the customer having to dial an access code.

GENERAL INFORMATION

Lightship will deploy two PIC (“Primary Interexchange Carrier”) technology in its switches. This technology will enable the customer to presubscribe to the same or a different carrier for their intraLATA and interLATA services.

Appropriate tariffs will be revised and filed in accordance with this plan.

Lightship will offer customers the ability to access any participating carriers by dialing the appropriate access code (10XXX/101XXX).

CARRIER INFORMATION

Carriers will have the option of offering intraLATA service only, or both intraLATA and interLATA service.

Lightship will notify potential carriers prior to the initial availability of presubscription in specific market areas. Carriers will have the option of participating in all market areas or in a specific market area. Carriers will be required to return a completed Non-Disclosure Agreement and Participation Agreement(s). These documents will be provided to carriers as part of the Lightship carrier correspondence process.

Lightship will not participate in billing disputes for intraLATA service between alternative competing carriers and their customers.

Carriers wishing to participate will be requested to submit Access Service Requests/Translation Questionnaires to the Access Tandem owner and to Lightship.

CALL ELIGIBILITY/TOLL DIALING PLAN

A local service customer of Lightship will have calls routed according to the following plan:

If an Lightship Customer Dials:

911
411/555-1212
611
0-
0 + interexchange
1 + 7 or 10 digits
0 + 7 or 10 digits interexchange
10XXX or 101XXXX + 0-
10XXX or 101XXXX + 0 + 7 or 10 digits
10XXX or 101XXXX + 7 or 10 digits

The Call is Handled By/Routed to:

PSAP on originating line number
ILEC Directory Assistance Operator
Lightship Repair Center
Lightship Operator
IntraLATA Toll Provider
IntraLATA Toll Provider
IntraLATA Toll Provider
XXX/XXXX Carrier
XXX/XXXX Carrier
XXX/XXXX Carrier

If a Lightship customer originates a call to a carrier Operator by dialing 00-, the call will be routed to the PIC on that customer's line. If the customer originates a call to a carrier Operator by dialing an access code (i.e., 10XXX/101XXX + 0-), the call will be routed to the XXX/XXXX carrier. In both cases, the carrier's switch is responsible for routing this call to the carrier's Operator or to an announcement.

NETWORK INFORMATION

All originating intraLATA traffic will initially be routed via the incumbent Local Exchange Carrier ("LEC") Access Tandem(s). Following conversion, direct trunks between the Lightship switch and the carrier location(s) may be provisioned where traffic volumes warrant.

Carriers must have Feature Group D trunks in place (or ordered) between their point of presence and the incumbent LEC Access Tandem(s).

Lightship will route all originating intraLATA traffic to the designated carrier and will only block traffic at the request of the end user customer and/or in compliance with regulatory regulations. Requests from carriers to block traffic or to remove customers from their network will not be honored. Calls that cannot be completed to a carrier will be routed to an announcement.

CUSTOMER CONTACT INFORMATION

Lightship currently has no subscribers in Maine. Following plan approval, Lightship will provide notice to any new subscribers in Maine that they may select a participating carrier for carriage of intraLATA toll traffic.

Lightship customer contact representatives will process customer initiated PIC selections to Lightship or to an alternative intraLATA carrier. Carriers will have the option of allowing the Lightship representatives to process PIC requests on their behalf.

Alternative carriers may submit PIC changes to Lightship via fax/paper interface. Details regarding this process will be provided as part of our carrier correspondence.

Lightship will accept as a bona fide PIC a selection of "NO PIC" as a choice. "NO PIC" customers will have access code dialing capability to reach participating intraLATA carriers.

Lightship will provide customers with a confirmation notification of their PIC (Lightship or an alternative carrier) selection.

Lightship customer contact representatives will not dissuade or comment on a customer's choice of its intraLATA PIC when the customer contacts Lightship to change the PIC. Lightship customer contact representatives will respond to customer inquiries about intraLATA carriers in a competitively neutral fashion. If a customer requests information relating to carriers other than Lightship, a list of participating carriers will be read to that customer in random order by Lightship representatives.

If the intraLATA toll carrier selected by the customer permits Lightship to process orders on its behalf, Lightship will accept the PIC change request. If a customer selects an intraLATA toll carrier that does not allow Lightship to process PIC changes on its behalf, Lightship will provide the customer with the carrier's toll-free number (if provided by the carrier).

Lightship representatives will not discuss alternative carrier rates or services and will not provide customers with Carrier Identification Codes or access code dialing instructions.

Lightship representatives will not initiate or accept three-way calls from alternative carriers to discuss presubscription.

PRESUBSCRIPTION INFORMATION

A five dollar PIC change charge will be incurred and billed to the customer for each eligible line, and for each PIC, where a PIC change is made. Lightship will offer its existing customers a 90-day grace period from the date of Lightship's implementation of intraLATA equal access to make a "free" presubscription selection. Customers may change intraLATA carriers only one time during the 90-day grace period without a PIC change charge. After the 90-day grace period, Lightship will assess the five dollar PIC charge. Lightship offers carriers the option of having the PIC charge billed to the carrier or to the customer.

Customers must affirmatively select their presubscribed IntraLATA carrier. Customers will have the opportunity to select a participating carrier, or they will be assigned a NO PIC designation. Customers assigned a NO PIC designation as set forth in this paragraph will be required to dial an access code to reach an intraLATA carrier's network.

In an effort to reduce unauthorized PIC changes, Lightship will offer intraLATA PIC Freeze service

to all customers at no charge. PIC Freeze can only be initiated (or removed) by affirmative action of the customer requesting it through their Lightship representative.

If a Lightship customer denies requesting a change in intraLATA toll providers as submitted by an intraLATA carrier, and the intraLATA carrier is unable to produce a Letter of Agency signed by the customer, the intraLATA carrier will be assessed a thirty dollar charge for the unauthorized PIC change.

Lightship will process intraLATA and interLATA PIC selections in the same manner and under the same intervals of time.